

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE
MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

RONNIE TOWNSEND #121142

RECEIVED

PLAINTIFF,

VS.

2005 DEC 11 A 10:05

MARK P. HACKETT
U.S. DISTRICT COURT
MIDDLE DISTRICT

CASE NO. 2:06-CV-564-MHT-LSC

CAPTAIN GEORGE EDWARD, AND
LIEUTENANT WILLIE COPELAND
DEFENDANTS.

RESPONSE OF PLAINTIFF

COMES NOW PLAINTIFF, RONNIE TOWNSEND, BY AND THROUGH PRO-SE, AND RESPONDS TO THE DEFENDANT ANSWER IN THE ABOVE-STYLED ACTION. STATES AS FOLLOWS:

PLAINTIFF DENIES EACH AND EVERY MATERIAL ALLEGATION MADE IN DEFENDANT SPECIAL REPORT, AND DEMANDS STRICT PROOF THEREOF.

DEFENDANT DID VIOLATED PLAINTIFF DUE-PROCESS RIGHTS.

DEFENDANT DID CAUSED AND ALLOWED TO CONTINUE UN-CONSTITUTIONAL CONDITION OF THE PLAINTIFF CONFINEMENT.

DEFENDANT DID CONSPIRED, RETALIATED AND DISCRIMINATED AGAINST THE PLAINTIFF.

THE DEFENDANT HAVE FAILED TO REFUTE PLAINTIFF CLAIMS THEREFORE BY LAW THOSE FACTS MUST BE TAKEN AS TRUE.

THE DEFENDANT IS MISLEAD COURT CONCERNING THE STATUTE OF LIMITATIONS.

THE DEFENDANT IS NOT ENTITLED TO STATE AGENT IMMUNITY.

THE DEFENDANT IS NOT ENTITLED TO SOVEREIGN IMMUNITY UNDER ARTICLE I, SEC: 14 OF THE ALABAMA CONSTITUTION (1901).

THE DEFENDANT IS NOT ENTITLED TO IMMUNE FROM SUIT UNDER THE ELEVENTH AMENDMENT TO THE UNITED STATES CONSTITUTION.

THE DEFENDANT IS NOT IMMUNE FROM SUIT DUE TO QUALIFIED IMMUNITY.

RESPECTFULLY SUBMITTED

Ronnie Townsend

RONNIE TOWNSEND

100 WARRIOR LANE

BESSEMER AL. 35023

ADDRESS OF COUNSEL:

OFFICE OF ATTORNEY GENERAL
BENJAMIN H. ALBRITTON
11 SOUTH UNION STREET
MONTGOMERY, AL. 36130

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE, THIS THE 12th DAY OF DECEMBER 2006, SERVED A COPY OF THE FOREGOING UPON BENJAMIN H. ALBRITTON COUNSEL FOR DEFENDANT'S BY PLACING SAME IN THE UNITED STATES MAIL, POSTAGE PREPAID AND PROPERLY ADDRESSED AS FOLLOWS:

OFFICE OF ATTORNEY GENERAL
BENJAMIN H. ALBRITTON
11 SOUTH UNION STREET
MONTGOMERY AL 36130

Ronnie Townsend

RONNIE TOWNSEND^{*} 121142
100 WARRIOR LANE
BESSEMER AL 35023